IN THE UNITED STATE DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

ALISON O'DONNELL,) CASE NO. 1:16-CV-02480-DCN
Plaintiff,) JUDGE DONALD C. NUGENT
v.)
UNIVERSITY HOSPITALS HEALTH)
SYSTEM, et al.,)
Defendants.)

DEFENDANTS' CONSENT MOTION TO CONTINUE THE CASE MANAGEMENT CONFERENCE

On December 16, 2016, Defendants University Hospitals Health System, Inc., Naveen Uli, Sumana Narasimhan, and Rose Gubitosi-Klug (collectively, "Defendants") filed a consent motion to extend the deadline to answer Plaintiff Alison O'Donnell's ("Plaintiff") Complaint until January 9, 2017. [ECF Doc. 6]. On December 21, 2016, this Court granted Defendants' motion to extend the responsive pleading deadline to January 9, 2017, and also rescheduled the case management conference to January 13, 2017.

Lead counsel for Defendants, David A. Campbell, will be on a previously scheduled vacation and out of the country on January 13, 2017. Mr. Campbell will be returning from vacation on January 16, 2017. Accordingly, Defendants respectfully request that the case management conference be continued to a date after January 16, 2017.

Defendants affirm that the requested extension is not for purposes of undue delay. Plaintiff's counsel has been consulted and consents to this request for a continuance.

WHEREFORE, Defendants respectfully request that the case management conference currently scheduled for January 13, 2017 be continued to a date after January 16, 2017 so that Defendants' lead counsel can attend.

Respectfully submitted,

/s/ Liana R. Hollingsworth

David A. Campbell (0066494) Liana R. Hollingsworth (0085185) Vorys, Sater, Seymour and Pease LLP 200 Public Square, Suite 1400 Cleveland, Ohio 44114 Telephone: (216) 479-6100

Facsimile: (216) 479-6060 Email: <u>dacampbell@vorys.com</u> <u>lrhollingsworth@vorys.com</u>

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 5th day of January, 2017, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties, when applicable, by operation of the Court's ECF system. Parties may access this filing through the Court's electronic filing system. If parties will not receive notice via the Court's electronic filing system, a true and correct copy of the foregoing will be served via regular United States Mail, postage prepaid, upon the following:

Peter C. Mapley Brian Spitz The Spitz Law Firm, LLC 25200 Chagrin Blvd., Suite 200 Beachwood, OH 44122

Attorney for Plaintiff

/s/ Liana R. Hollingsworth

Liana R. Hollingsworth (0085185) Vorys, Sater, Seymour and Pease LLP 200 Public Square, Suite 1400 Cleveland, Ohio 44114 Telephone: (216) 479-6100

Facsimile: (216) 479-6060

Email: lrhollingsworth@vorys.com

One of the Attorneys for Defendants